

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF NORTH CAROLINA
DURHAM DIVISION**

In re:

Cassandra Gore,

Bankruptcy Case No.: 05-82613

Social Security No. xxx-xx-4930

Mailing Address: 2 Kilburn Lane, Durham, NC 27707-

Debtor.

MOTION TO REOPEN CASE

Now comes the debtor above-named, and shows unto the Court as follows:

1. That this matter is a core proceeding pursuant to 28 U.S.C. Section 157, and that the Court has jurisdiction pursuant to 28 U.S.A. Sections 151, 157 and 1334.
2. That the debtor(s) file(s) this motion pursuant to 11 U.S.C. Section 350(b) to reopen this case.
3. That prior to the completion of her Chapter 13 plan and discharge granted in this case, the debtor had a mortgage serviced or held by FCI Lender Services, Inc., Steel Capital Steel, L.L.C., Statebridge Company, L.L.C. and/or Home Loan Servicing, Inc., which had been paid during her Chapter 13 plan.
4. That subsequently, FCI Lender Services, Inc., Steel Capital Steel, L.L.C., Statebridge Company, L.L.C. and/or Home Loan Servicing, Inc., have asserted a mortgage acreage of \$18,366.87;
5. That FCI Lender Services, Inc., Steel Capital Steel, L.L.C., Statebridge Company, L.L.C., Home Loan Servicing, Inc., and David A. Simpson, have commenced foreclosure proceedings against the Debtor.
6. The reopening of this case is necessary to afford the debtor the opportunity to bring an Adversary Proceeding against FCI Lender Services, Inc., Steel Capital Steel, L.L.C., Statebridge Company, L.L.C., Home Loan Servicing, Inc. And David A. Simpson, P.C. For a determination of that status and balance of her mortgage at the end of her Chapter 13 case and for actual, statutory, and punitive damages, including for attorneys' fees.

WHEREFORE, the debtor moves the Court to reopen this case, for an order directing FCI Lender Services, Inc., Steel Capital Steel, L.L.C., Statebridge Company, L.L.C. and/or Home Loan Servicing, Inc. to halt any foreclosure proceeding and for such other and further relief as the court may seem just and proper.

Dated: July 5, 2011

LAW OFFICES OF JOHN T. ORCUTT, P.C.

/s Edward Boltz
Edward Boltz
Attorney for the Plaintiff
North Carolina State Bar No.: 23003
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CERTIFICATE OF SERVICE

I, Renee Nolte, certify, under penalty of perjury, that I am, and at all times during this service of process was, not less than 18 years of age and not a party to the matter concerning which service of process was made, and that service of MOTION TO REOPEN on June 23, 2011, by **regular, first class United States mail**, postage fully pre-paid, addressed to:

Richard M. Hutson, II
Chapter 13 Trustee

Michael D. West
Bankruptcy Administrator
Post Office Box 1828
Greensboro, NC 27402

Statebridge Company, L.L.C.
Attn: Managing Agent
4600 South Syracuse Street
Suite 700
Denver, CO 80237

Home Loan Servicing, Inc.
Attn: Managing Agent
Post Office Box 1838
Pittsburgh, PA 15230-1838

Statebridge Company, L.L.C.
Attn: Managing Agent
National City Bank Of Indiana
150 Allegheny Center IDC 24040
Pittsburgh, PA 15212

Matthew McKee
Attorney
2701 Coltsgate Rd.
Suite 300
Charlotte, NC 28211-

FCI Lender Services, Inc.
Attn: Managing Agent
8180 East Kaiser Blvd.
Anaheim CA 92808

David A. Simpson
Substitute Trustee
6047 Tyvola Glenn Circle
Charlotte NC 28217

FCI Lender Services, Inc.
C/o National Registered Agents, Inc.
120 Penmarc Drive
Raleigh NC 27603

Roberts Townsend & Thomas, P.C.
2550 West Tyvola Rd.
Suite 520
Charlotte NC 28217

Steel Capital Steel, Inc.
Attn: Managing Agent
2500 North Tucson Blvd.
Suite 140
Tucson, AZ 85716

Steel Capital Steel, L.L.C.
C/o Incorp Services, Inc
2360 Corporate Circle
Suite 400
Henderson NV 89074-772

and also by **certified mail, return receipt requested**, addressed to:

Statebridge Company, L.L.C.
Attn: Managing Agent
4600 South Syracuse Street
Suite 700
Denver, CO 80237

Home Loan Servicing, Inc.
Attn: Managing Agent
Post Office Box 1838
Pittsburgh, PA 15230-1838

Statebridge Company, L.L.C.
Attn: Managing Agent
National City Bank Of Indiana
150 Allegheny Center IDC 24040
Pittsburgh, PA 15212

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Attn: Managing Agent
8180 East Kaiser Blvd.
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/s Renee Nolte
Renee Nolte